



3628 South 35th Street
Tacoma, Washington 98409-3192

TACOMA PUBLIC UTILITIES

August 16, 2013

VIA EMail

Tech Forum
Bonneville Power Administration
PO Box 491
Vancouver, WA 98666
techforum@bpa.gov

Re: Tacoma Power's comments regarding BPA Commercial Initiatives

Tacoma Power appreciates BPA's willingness to discuss the cumulative and interactive impacts to customers of multiple BPA initiatives including, Managing Hourly Firm Sales, Short-Term Competitions and Preemption, Delivery of 3rd Party Balancing Reserves, 15-Minute Scheduling, NT Redispatch, and Short-Term ATC Automation. Some of these initiatives are concerning to Tacoma Power, and in our view, are best handled collectively given that BPA intends to implement all of these initiatives during the next two years.

Like many of the region's load serving entities, Tacoma Power frequently uses long-term firm point-to-point transmission redirected as hourly firm transmission to schedule daily or seasonal variations in power flow. Depending on implementation, BPA's proposals for Managing Hourly Firm Sales and Short-Term Competitions and Preemption could significantly disrupt this practice. We encourage BPA to incrementally phase-in these changes in a manner and timeframe that allows BPA and its transmission customers to collect data on evolving conditions, study its implications, and make appropriate adaptations. Unfortunately, the timeline presented by BPA on July 24th with implementation of Short-Term Competitions and Preemption commencing in September and Managing Hourly Firm Sales starting as early as December offers little opportunity for this to occur.

Despite proposing a compressed timeframe for implementation, BPA has responsibly taken other actions to limit the potential disruption of some initiatives. For example, BPA's interim decision to exempt redirected transmission service requests ("TSR") from Short-Term Competitions and Preemption appropriately addresses the serious concerns raised by the Federal Energy Regulatory Commission ("FERC") in its Entergy Order.¹ We believe that FERC's reasoning in this order was sound and in the near future, we anticipate providing further comments explaining why BPA should exempt redirected TSRs on a permanent basis.

Finally, we thank BPA for its consideration and for its deliberate process in implementing these initiatives.

Sincerely,

Nicolas Garcia
Assistant Power Manager

¹ Entergy Servs., Inc., 143 FERC ¶ 61,143 (2013).